

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>TIMOTHY LEE WILKINSON</b>	:	
	:	<b>CASE NO. 1:19-bk-03021</b>
<b>CHRISTINE MARIE WILKINSON</b>	:	
	:	<b>ADVERSARY NO.</b>
	:	
<b>Debtor(s)</b>	:	<b>Nature of Proceeding</b>
	:	<b>Objection to Motion</b>
	:	<b>to Modify Plan</b>
	:	
<b>21st Mortgage</b>	:	
<b>Plaintiff(s)/Movant(s)</b>	:	<b>Document #:</b>
<b>vs.</b>	:	
	:	
<b>TIMOTHY LEE WILKINSON</b>	:	
	:	
<b>CHRISTINE MARIE WILKINSON</b>	:	

**Defendant(s)/Respondent(s)**

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE**<sup>1</sup>

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance<sup>2</sup>.

Reason for the continuance. Parties require additional time to resolve.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: January 8, 2021

/s/ Kara K. Gendron  
Kara K. Gendron, Esquire  
Attorney ID 87577  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
karagendron@gmail.com

---

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.